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9 **UNITED STATES BANKRUPTCY COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA, SANTA ANA DIVISION**
11

12 In re
13 The Litigation Practice Group P.C.,
14 Debtor.

Case No. 8:23-bk-10571-SC

Chapter 11

**STIPULATION BETWEEN MORNING
LAW GROUP P.C., RESOLUTION
PROCESSING LLC, AND RICHARD A.
MARSHACK, LIQUIDATION TRUSTEE
OF THE LPG LIQUIDATING TRUST TO
EXTEND DEADLINES FOR
OPPOSITION AND REPLY RE:**

**MOTION FOR ENTRY OF ORDER
ENFORCING AGREEMENT OF
PURCHASE AND SALE AND JOINT
ESCROW INSTRUCTION, AND
COMPELLING MORNING LAW
GROUP, P.C. TO MAKE PAYMENT
THEREUNDER AND RELATED RELIEF
[DOC. NO. 2363]**

Judge: Hon. Scott C. Clarkson
Date: April 23, 2025
Time: 1:30 p.m.
Place: Courtroom 5C
411 W. Fourth Street
Santa Ana, CA 92701

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27 Morning Law Group P.C. ("MLG"), Resolution Processing, LLC (ResPro"), and Richard
28 A. Marshack, Liquidation Trustee of the LPG Liquidating Trust (the "Trustee") (MLG, ResPro

1 and Trustee, taken together, the “Parties”), hereby enter into this stipulation and represent as
2 follows:

3 **RECITALS**

4 A. On April 2, 2025, the Trustee filed the Motion for Entry of Order Enforcing
5 Agreement of Purchase and Sale and Joint Escrow Instruction, and Compelling Morning Law
6 Group, P.C. to Make Payment Thereunder and Related Relief (doc. no. 2363) (the “Motion”).

7 B. The hearing on the Motion is scheduled for April 23, 2025, at 1:30 p.m.

8 C. The last day to file an opposition to the Motion pursuant to LBR 9013-1 is April 9,
9 2025.

10 D. The last day to file a reply in support of the Motion pursuant to LBR 9013-1 is
11 April 16, 2025.

12 E. The Parties are engaged in settlement discussions with respect to a potential
13 consensual resolution of that matters addressed in the Motion.

14 F. The Parties bring this stipulation to afford additional time to focus on such
15 settlement discussions.

16 G. Accordingly the Parties hereby stipulate, subject to Court approval:

17 **STIPULATION**

18 1. The deadline for parties to this stipulation to file a response or opposition to the
19 Motion shall be extended to April 14, 2025.

20 2. The deadline for Movant to file a reply shall be extended to April 21, 2025.

21 3. Unless otherwise agreed to in writing by the parties or ordered by the Court, the
22 hearing on the Motion shall remain on April 23, 2025, at 1:30 p.m.

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SAUL EWING LLP
1888 CENTURY PARK EAST, SUITE 1500
LOS ANGELES, CALIFORNIA 90067
(310) 255-6100

1 4. MLG will lodge a proposed order approving and giving effect to this stipulation
2 immediately after filing the stipulation.
3

4 DATED: April 9, 2025

SAUL EWING LLP

5
6 By: 

ZEV SHECHTMAN
CAROL CHOW
Attorneys for Morning Law Group P.C.

7
8
9 DATED: April 9, 2025

FOX ROTHSCHILD LLP

10
11 By: 

KEITH C. OWENS
NICHOLAS A. KOFFROTH
Attorneys for Richard A. Marshack, Liquidation
Trustee of the LPG Liquidating Trust

12
13
14
15 DATED: April 9, 2025

LAW OFFICE OF WILLIAM P. FENNELL, APLC

16
17 By: _____

WILLIAM P. FENNELL
Attorneys for Resolution Processing, LLC
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2 immediately after filing the stipulation.

3
4 DATED: April 9, 2025

SAUL EWING LLP

5
6 By: _____

ZEV SHECHTMAN

CAROL CHOW

Attorneys for Morning Law Group P.C.

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8
9 DATED: April 9, 2025

FOX ROTHSCHILD LLP

10
11 By: _____

KEITH C. OWENS

NICHOLAS A. KOFFROTH

Attorneys for Richard A. Marshack, Liquidation
Trustee of the LPG Liquidating Trust

12
13
14
15 DATED: April 9, 2025

LAW OFFICE OF WILLIAM P. FENNELL, APLC

16
17 By:  _____

WILLIAM P. FENNELL

Attorneys for Resolution Processing, LLC

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
Saul Ewing LLP, 1888 Century Park East, Suite 1500, Los Angeles, CA 90067

A true and correct copy of the foregoing document entitled (*specify*): **Stipulation Between Morning Law Group P.C. and Richard A. Marshack, Liquidation Trustee of The LPG Liquidating Trust to Extend Deadlines for Opposition and Reply Re: Motion for Entry of Order Enforcing Agreement of Purchase and Sale and Joint Escrow Instruction, and Compelling Morning Law Group, P.C. to Make Payment Thereunder and Related Relief [Doc. No. 2363]** be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **April 9, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

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☒ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**:

On (*date*) _____, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 9, 2025
Date

Hannah Richmond
Printed Name

/s/ Hannah Richmond
Signature

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF) (continued):

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This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

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